Russell City Energy Company, LLC

717 Texas Avenue Suite 1000 Houston, TX 77002

July 26, 2018

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105-2097 Attn: Title V Reports RECEIVED

JUL 2 6 2018

Bay Area Air Quality Management District

Re:

Russell City Energy Company, LLC

Title V CEMS Semi-Annual Monitoring Report

Facility No. B8136

Reporting Period: January 1, 2018 – June 30, 2018

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Compliance Monitoring Report for the Russell City Energy Center (RCEC).

RCEC is currently in compliance with the District CEMS regulations. RCEC maintained compliance with the monitoring requirements listed in the Title V permit for RCEC during this reporting period.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

If you have any questions or require additional information, please contact Lauren Bresnahan, EHS Specialist III, at (510) 731-1407.

Sincerely,

Cameron White

Plant Manager and

Designated Representative/ Responsible Official

Russell City Energy Company, LLC

Facility #: B8136

Page: 1 of 17

Table VII - A Applicable Limits and Compliance Monitoring Requirements S-1, S-3 GAS TURBINE

S-2, S-4 HEAT RECOVERY STEAM GENERATO	DR
---------------------------------------	----

Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Type	Ves	No
NO _x	BAAQMD 9-3-303	N		125 ppm	BAAQMD 1-520.1	. с	CEM	X	
NOx	BAAQMD 9-9-301.1.3	Y	:	9 ppmv @ 15% O2, dry	BAAQMD 9-9-501	С	CEM	X	
NOx	BAAQMD 9-9- 301.2	N		0.15 lb/MW-hr or 5 ppmv	BAAQMD 9-9-501	С	CEM	x	
NO _x	SIP 9-9-301.3	Y		9 ppmv @ 15% O ₂ , dry	BAAQMD 9-9-501	С	CEM	X	
NO _x	40 CFR 60 Subpart KKKK 60.4320(a) Table 1	Y		15 ppm at 15% O2 or 0.43 lb/MW-hr	40 CFR 60 Subpart KKKK 60.4340(b)(1)	c	СЕМ	X	
NOx		Y		None	40 CFR 75.10	С	СЕМ	X	
NO _x	BAAQMD condition #23763, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	,
NO _x	BAAQMD condition #23763, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
NO _x	Federal PSD Permit condition #26117, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	x ,	
NO _x	Federal PSD Permit condition #26117, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	

Facility #: B8136 Page: 2 of 17

Type of	Citation of	FE	Future Effective	Limit	Monitoring Requirement	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Date	Limit	Citation	Frequency (P/C/N)	Туре	Yes	No
NOx	BAAQMD condition #23763, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	С	СЕМ	X	
NOx	BAAQMD condition #23763, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/ A	Source test at maximum load	X	
NOx	Federal PSD Permit condition #26117, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	С	СЕМ	x	
NOx	Federal PSD Permit condition #26117, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
NOx	BAAQMD condition #23763, part 19b	Y		2.0 ppmv, @ 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	С	СЕМ	х	
NO _x	BAAQMD condition #23763, part 19b	Y		2.0 ppmv, @ 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	х	

Facility #: B8136 Page: 3 of 17

Type of	Citation of	FE.	Future		Monitoring	Monitoring	Monitoring	Co	mpliance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Υe	No
NOx	Federal PSD Permit condition #26117, part 19b	Y		2.0 ppmv, @ 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	С	СЕМ	X	
NO _x	Federal PSD Permit condition #26117, part 19b	Y		2.0 ppmv, @ 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum toad	X	
NO _x	BAAQMD condition #23763, part 20	Y		95 lb/turbine during hot start-up	BAAQMD condition #23763, part 26	P/D	Records,	x	
NO _x	Federal PSD Permit condition #26117, part 20	Y		95 lb/turbine during hot start-up	Federal PSD Permit condition #26117, part 26	P/D	Records,	x	
NOx	BAAQMD condition #23763, part 20	Y		40 lb/turbine during shutdown	BAAQMD condition #23763, part 26	P/D	Redords,	x	
NOx	Federal PSD Permit condition #26117, part 20	Y		40 lb/turbine during shutdown	Federal PSD Permit condition #26117, part 26	P/D	Records,	X	
NOx	BAAQMD condition #23763, part 20	Y		480 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 26	P/D	Records,	x	
NOx	Federal PSD Permit condition #26117, part 20	Y		480 lb/turbine during cold start-up or combustor tuning operation	Federal PSD Permit condition #26117, part 26	P/D	Records,	x	

Facility #: B8136 Page: 4 of 17

Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Compliance	
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
NOx	BAAQMD condition #23763, part 20	Y		125 lb/turbine during warm start-up	BAAQMD condition #23763, part 26	P/D	Records,	X	
NOx	Federal PSD Permit condition #26117, part 20	Y		125 lb/turbine during warm start-up	Federal PSD Permit condition #26117, part 26	P/D	Records,	Х	
NO _x	BAAQMD condition #23763, part 22a	Y		1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning	BAAQMD condition #23763, part 26	C	СЕМ	x	
NO _x	Federal PSD Permit condition #26117, part 22a	Y		1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning	Federal PSD Permit condition #26117, part 26	С	СЕМ	x	
NO _x	BAAQMD condition #23763, part 22b	Y		1225 lb/day for turbines, HRSGs, and fire pump diesel engine, combined during ozone season from June 1 through September 30	BAAQMD condition #23763, part 26	c	СЕМ	X	
NO _x	BAAQMD condition #23763, part 23a	Y		127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 26	С	СЕМ	X	
NO _x	Federal PSD Permit condition #26117, part 23a	Y		127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 26	C ·	СЕМ	х	

Facility #: B8136 Page: 5 of 17

dia di

Type of	Citation of	FE	Future	•••	Monitoring	Monitoring	Monitoring	Com	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Type	Yes	No
со	BAAQMD condition #23763, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	СЕМ	x	
СО	BAAQMD condition #23763, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum and minimum load	Х	
СО	Federal PSD Permit condition #26117, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	С	СЕМ	X	
СО	Federal PSD Permit condition #26117, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	\$ource test at maximum and minimum load	X	
CO	BAAQMD condition #23763, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	СЕМ	X	
со	BAAQMD condition #23763, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum and minimum load	X	
со	Federal PSD Permit condition #26117, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	С	СЕМ	x	

Facility #: B8136 **Page:** 6 of 17

Type of	Citation of	FE	Future		Monitoring	Monitoring Monitoring	Monitoring	Compliance	
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
со	Federal PSD Permit condition #26117, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	X	
CO	BAAQMD condition #23763, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	С	СЕМ	х	
со	BAAQMD condition #23763, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #13763, part 30	P/A	Source test at maximum and minimum load	х	
СО	Federal PSD Permit condition #26117, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	С	СЕМ	х	
со	Federal PSD Permit condition #26117, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	х	
со	BAAQMD condition #23763, part 20	Y	9	891 lb/turbine during hot start-up	BAAQMD condition #23763, part 26	P/D	Records,	х	
СО	Federal PSD Permit condition #26117, part 20	Y		891 lb/turbine during hot start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	х	

Facility #: B8136 Page: 7 of 17

Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Y es	No
СО	BAAQMD condition #23763, part 20	Y		2,514 lb/turbine during warm start-up	BAAQMD condition #23763, part 26	P/D	Records,	X	
СО	Federal PSD Permit condition #26117, part 20	Y		2,514 lb/turbine during warm start-up	Federal PSD Permit condition #26117, part 26	P/D	Records,	x	
СО	BAAQMD condition #23763, part 20	Y		100 lb/turbine during shutdown	BAAQMD condition #23763, part 26	P/D	Records,	х	
со	Federal PSD Permit condition #26117, part 20	Y	,	100 lb/turbine during shutdown	Federal PSD Permit condition #26117, part 26	P/D	Records,	x	
со	BAAQMD condition #23763, part 20	Y		2,514 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 26	P/D	Records,	х	
со	Federal PSD Permit condition #26117, part 20	Y		2,514 lb/turbine during cold start-up or combustor tuning operation	Federal PSD Permit condition #26117, part 26	P/D	Records,	х	
со	BAAQMD condition #23763, part 22c	Y		7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 26b	С	СЕМ	x	
СО	Federal PSD Permit condition #26117, part 22c	Υ		7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined	Federal PSD Permit condition #26117, part 26b	С	СВМ	х	
со	BAAQMD condition #23763, part 23b	Y		330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 26b	С	СЕМ	х	

Facility Name:

Russell City Energy Company, LLC.

Facility #: Page:

B8136 8 of 17

Reporting Period:

January 1, 2018 to June 30, 2018

Future Monitoring Monitoring Compliance FE Monitoring Type of Citation of Effective Limit Frequency Requirement Limit Limit Y/N Type (P/C/N) Yes No Date Citation 330 ton/yr for turbines, Federal PSD Federal PSD HRSGs, and fire pump Permit condition Permit condition CO Y diesel engine combined C CEM \mathbf{X} #26117, #26117, (includes emissions from part 23b part 26b commissioning period) fuel flow monitor and CO_2 Y None 40 CFR 75.10 C X CO_2 calculation GLC¹ of 0.5 ppm for 3 min BAAQMD 9-1-Y N X SO_2 or 0.25 ppm for 60 min or 301 0.05 ppm for 24 hours BAAQMD 9-1-Y N Х SO_2 300 ppm (dry) 302 40 CFR 60 40 CFR 60 Natural gas Subpart KKKK Subpart KKKK sulfur Y P SO₂ 0.060 lb/MMBtu Х 60.443(a)(2) 60.4365(a) content certification 40 CFR 75.11, Fuel 40 CFR 75, measure- SO_2 Y None Х Appendix D, ments, part 2.3 calculations **BAAQMD BAAQMD** Source test condition 6.21 lb/hr, for turbine and condition SO₂ Y P/A X at maximum #23763, HRSG combined #23763, load part 19g part 30 **BAAQMD BAAQMD** 0.00128 lb/MM BTU, for Source test condition condition SO₂ Y turbine and HRSG P/A at maximum Х #23763, #23763, combined load part 19g part 30 **BAAQMD** BAAQMD 292 lb/day for turbines, condition condition Records, SO_2 Y P/D HRSGs, and fire pump X #23763, #23763, calculations diesel engine combined part 22f part 27 12.2 ton/yr for turbines, **BAAQMD** BAAQMD HRSGs, and diesel fire condition condition Records, SO₂ Y pump combined (includes P/D X #23763, #23763, calculations emissions from part 27 part 23e

commissioning period)

Title V CEMS Semi-Annual Monitoring Report ssell City Energy Company, LLC. nuary 1, 2018 to June 30, 2018

Facility #: B8136 Page: 9 of 17

Facility Name:	Russell City Energy C
Reporting Period:	January 1, 2018 to Jun

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Comp Ves	liance No
Opacity	BAAQMD 6-1- 301	N		≥ Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	·
Opacity	SIP 6-301	Y		≥ Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
FP	BAAQMD 6-1- 310	N		0.15 grain/dscf		N		x	
FP	SIP 6-310	Y		0.15 grain/dscf		N		X	
FP	BAAQMD 6-1- 310.3	N		0.15 grain/dscf @ 6% O ₂		N		x	
	SIP 6-310.3	Y		0.15 grain/dscf @ 6% O ₂		N		х	
PM ₁₀	BAAQMD condition #23763, part 19h	Y		7.5 lb/hr, for each turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	x	
PM ₁₀	BAAQMD condition #23763, part 19h	Y		0.0036 lb/MMBTU, for each turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	x	
PM ₁₀	Federal PSD Permit condition #26117, part 19h	Y		7.5 lb/hr, for each turbine and HRSG combined	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	x	
PM _{to}	Federal PSD Permit condition #26117, part 19h	Y		0.0036 lb/MMBTU, for each turbine and HRSG combined	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
PM ₁₀	BAAQMD condition #23763, part 22e	Y		413 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
PM ₁₀	Federal PSD Permit condition #26117, part 22e	Y		413 lb/day for turbines, HRSGs, and fire pump diesel engine combined	Federal PSD Permit condition #26117, part 27	P/D	Records, calculations	X	

Facility Name: Reporting Period:

Russell City Energy Company, LLC. January 1, 2018 to June 30, 2018

Facility #: B8136 Page: 10 of 17

Future Monitoring Monitoring Compliance FE Monitoring Type of Citation of Effective Limit Requirement Frequency Limit Limit Y/N Type Yes No Date Citation (P/C/N) 71.8 ton/yr for turbines, BAAQMD **BAAQMD** HRSGs, and fire pump condition condition Records, Y P/D Х PM_{10} diesel engine combined #23763, #23763, calculations (includes emissions from part 23d part 27 commissioning period) 71.8 ton/yr for turbines, Federal PSD Federal PSD HRSGs, and fire pump Permit condition Permit condition Records, PM_{10} Y diesel engine combined P/D X #26117, #26117, calculations (includes emissions from part 23d part 27 commissioning period) 2.86 lb/hr (as CH4) for **BAAQMD** each turbine and HRSG BAAQMD Source test condition combined except during condition **POC** Υ P/A at maximum X #23763, turbine startup, shutdown, #23763, load part 19f part 30 or combustor tuning operation 0.00128 lb/MM BTU (as **BAAQMD** CH4) for each turbine, and BAAQMD Source test condition HRSG combined except condition **POC** Υ P/A at maximum Х #23763, during turbine startup, #23763, load part 19f shutdown, or combustor part 30 tuning operation **BAAQMD BAAQMD** condition 35.3 lb/turbine during hot condition Records, **POC** Y P/D X #23763, #23763, start-up calculations part 20 part 27 **BAAQMD BAAQMD** condition 79 lb/turbine during condition Records, POC Y P/D X #23763, warm start-up #23763, calculations part 20 part 27 BAAQMD **BAAQMD** condition 16 lb/turbine during condition Records, POC Y P/D X #23763. shutdown #23763, calculations part 20 part 27 **BAAQMD BAAQMD** 83 lb/turbine during condition condition Records, POC Y cold start-up or combustor P/D X #23763, #23763, calculations tuning operation part 20 part 27

Title V CEMS Semi-Annual Monitoring Report Facility Name: Russell City Energy Company, LLC. Reporting Period: January 1, 2018 to June 30, 2018

Facility #: B8136 | Page: 11 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring	Com _l Yes	No
POC	BAAQMD condition #23763, part 22d	Y		295 lb/day (as CH4) for turbines and HRSGs combined	BAAQMD condition #23763, part 27	P/D	Records, calculations	 X -	
POC	BAAQMD condition #23763, part 23c	Y		28.5 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D	Records,	X	
NH ₃	BAAQMD condition #23763, Part 19e	N		5 ppmv, dry, @ 15% O ₂ , averaged over 3 hrs for each turbine and HRSG combined except during turbine startup or shutdown	BAAQMD condition #23763, part 26c, part 29	С	Ammonia injection rate monitor, calculations, and annual source test	 	
Formal- dehyde	BAAQMD condition #23763, part 25	N	1	10,912 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records,	X	
Formal- dehyde	BAAQMD condition #23763, part 25	N		10,912 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	
Benzene	BAAQMD condition #23763, part 25	Ŋ		226 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records,	x	
Benzene	BAAQMD condition #23763, part 25	N		226 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	
Specified PAHs	BAAQMD condition #23763, part 25	N		1.8 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records, calculations	X	
Specified PAHs	BAAQMD condition #23763, part 25	N		1.8 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	х	

Rep

B8136 17

Facility Name:	Russell City Energy Company, LLC.	Facility #:	B8136
eporting Period:	January 1, 2018 to June 30, 2018	Page:	12 of 1

Type of	Citation of	FE	Future Effective Date	Limit	Monitoring	Monitoring	Monitoring	Compliance	
Limit	Limit	Y/N			Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
Heat Input Iimit	BAAQMD condition #23763, part 13	Y		2,238.6 MM BTU/hour, 3- hr average for each Turbine and HRSG, total	BAAQMD condition #23763, part 26a	С	Fuel meter, calculations	х	
Heat Input limit	Federal PSD Permit condition #26117, part 13	Y		2,238.6 MM BTU/hour, 3- hr average for each Turbine and HRSG, total	Federal PSD Permit condition #26117, part 26a	С	Fuel meter, calculations	х	
Heat Input Limit	BAAQMD condition #23763, part 14	Y		53,726 MM BTU/calendar day, for each Turbine and HRSG, total	BAAQMD condition #23763, part 26a	С	fuel meter,	x	
Heat Input Limit	Federal PSD Permit condition #26117, part 14	Y		53,726 MM BTU/calendar day, for each Turbine and HRSG, total	Federal PSD Permit condition #26117, part 26a	С	fuel meter,	X	
Heat Input Limit	BAAQMD condition #23763, part 15	Y		35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined	BAAQMD condition #23763, part 26a	С	fuel meter,	Х	
Heat Input Limit	Federal PSD Permit condition #26117, part 15	Y		35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined	Federal PSD Permit condition #26117, part 26a	С	fuel meter,	Х	
CO₂E	Federal PSD Permit condition #26117, part 50	Y		242 metric tons per hour for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 15	P/M	Fuel meter, calculations	x	
CO₂E	Federal PSD Permit condition #26117, part 51	Y		5,802 metric tons per day for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 54	P/M	Fuel meter, calculations	x	
CO₂E	Federal PSD Permit condition #26117, part 52	Y		1,928,182 metric tons per year for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 54	P/M	Fuel meter, calculations	x	

Facility #: B8136 Page: 13 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Com _q Yes	iance No
Heat Rate	Federal PSD Permit condition #26117,	Y	Y	7,730 BTU/KW-hr for each gas turbine	Federal PSD Permit condition #26117,	P/A	Source Test	X	
	part 53				part 55				<u></u>

Facility #: B8136

Page: 14 of 17

Table VII - B **Applicable Limits and Compliance Monitoring Requirements** S-5, COOLING TOWER

Type of Limit	Citation of Limit	FE	Future	Limit	Monitoring Requirement Citation	Monitoring	Monitoring	Compliance	
		Y/N	Effective Date			Frequency (P/C/N)	Туре	Y	N
Opacity	BAAQMD 6-1- 303.1	N		≥ Ringelmann No. 2 for no more than 3 minutes in any hour		N		х	
Opacity	SIP Regulation 6-303.1	Y		≥ Ringelmann 2.0 for 3 minutes in any hour		N		Х	
FP	BAAQMD 6-1- 310	N		0.15 grain/dscf		N		х	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		х	
Total Dissolved Solids	BAAQMD Condition #23763, part 44	Y		6,200 ppmw (mg/l)	BAAQMD Condition #23763, part 44	P/D	Sample and test cooling tower water	х	
Total Dissolved Solids	Federal PSD Permit Condition #26117, part 44	Y		6,200 ppmw (mg/l)	Federal PSD Permit Condition #26117, part 44	P/D	Sample and test cooling tower water	X	

Facility Name: Russell City Energy Company, LLC.
Reporting Period: January 1, 2018 to June 30, 2018

Facility #: B8136

Page: 15 of 17

Table VII – C **Applicable Limits and Compliance Monitoring Requirements** S-6, FIRE PUMP DIESEL ENGINE

Type of	Citation of Limit	FE	Future Effective Date	Limit	Monitoring Requirement	Monitoring Frequency	Monitoring	Compliance		
Limit		Y/N			Citation	(P/C/N)	Type	Y	N	
Opacity	BAAQMD 6-1- 303.1	N		≥ Ringelmann No. 2 for no more than 3 minutes in any hour		N		X		
Opacity	SIP Regulation 6-303.1	Y		≥ Ringelmann 2.0 for 3 minutes in any hour		N		x		
FP	BAAQMD 6-1- 310	N		0.15 grain/dscf		N	:	x		
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		x		
SO ₂	BAAQMD 9-1- 301	Y		Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours	None	N	N/A	x		
SO ₂	BAAQMD 9-1- 304	Y		Fuel Sulfur Limit 0.5%	BAAQMD Condition # 20498, Parts 5 and 8	P/E	Vendor Certification	x		
Reliability Related Hours	BAAQMD 9-8- 330	N		50 hours	9-8-502	P/E	Totalizing meter, Record- keeping	x		
Hours for maintenanc e and testing	Title 17, California Code of Regulations section 93115.6(a) (4)	N		Not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 2002 edition	93115.10(d)	P/E	Totalizing meter. Record- keeping	х		
Reliability- related activities	BAAQMD Condition #23763, part 46	N	·	50 hours per calendar year	BAAQMD Condition #23763, parts 48, 49	P/E	Totalizing meter, record- keeping	х		

Facility #: B8136 Page: 16 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring	Compliance	
						(P/C/N)	Туре	Y	N
Reliability- related activities	Federal PSD Permit Condition #26117, part 46	N		50 hours per calendar year	Federal PSD Permit Condition #26117, parts 48, 49	P/E	Totalizing meter, record- keeping	X	
CO ₂ E	Federal PSD Permit Condition #26117, part 56	Y		7.6 metric tons per rolling 12-month period	Federal PSD Permit Condition #26117, part 58	P/E	Totalizing meter, record- keeping	X	

Facility Name: Russell City Energy Company, LLC.
Reporting Period: January 1, 2018 to June 30, 2018

Facility #: B8136

Page: 17 of 17

Table VII - D **Applicable Limits and Compliance Monitoring Requirements** S-7, S-8, S-9, S-10, & S-11 CIRCUIT BREAKERS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Com	iánce N		
	Federal PSD					Federal PSD	Federal PSD				
	Permit]	39.3 metric tons per rolling	Permit		Record-) i		
CO ₂ E	Condition	Y	Ì	12- month period from S-7	Condition	Р	keeping,	X			
	#26117,	į		through S-11, combined	#26117,		calculations				
	part 59				part 60		·	<u>.</u>			